

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

*In re: Hyundai and Kia Engine
Litigation*

8:17-cv-00838-JLS-JDE

Related Cases:

8:17-cv-01365-JLS-JDE

8:17-cv-02208-JLS-JDE

2:18-cv-05255-JLS-JDE

8:18-cv-00622-JLS-JDE

8:18-cv-02223-JLS-JDE

**DECLARATION OF MATTHEW D. SCHELKOPF IN FURTHER
SUPPORT OF PLAINTIFFS' UNOPPOSED MOTION FOR CLASS
COUNSEL FEE AND EXPENSE AWARD AND CLASS
REPRESENTATIVE SERVICE AWARDS**

I, Matthew D. Schelkopf, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a member in good standing of the bar of the Commonwealth of Pennsylvania, and I am admitted *pro hac vice* to this Court and am counsel for Plaintiffs and the Settlement Class. I respectfully submit this declaration in further support of Plaintiffs' Unopposed Motion for Class Counsel Fees and Expenses Award and Named Plaintiffs' Service Awards. The following is based on my personal knowledge, and if called upon to do so, I could and would competently testify to the statements set forth below.

2. Between September 25, 2020 and November 5, 2020, my firm has collectively spent approximately 161.40 hours working on this case, for a total lodestar amount of \$92,692.50.

Name	Role	Rate	Hours	Lodestar
Matthew D. Schelkopf	Partner	\$700	68.60	\$48,020.00
Lori Kier	Of Counsel	\$500	23.70	\$11,850.00
Joseph B. Kenney	Associate	\$475	69.10	\$32,822.50
<u>Totals</u>				<u>\$92,692.50</u>

3. Due to the amount of privileged information contained in the hourly billing records, those detailed records are not attached here. Consistent with Your Honor's Procedures, a spreadsheet in Microsoft Excel format that lists billed tasks will be provided to the Court.

4. Between September 25, 2020 and November 5, 2020, my firm has expended costs of approximately \$7,083.33. These expenses are reflected in the books and records of my firm. All of the expenses incurred were reasonable and necessary to the prosecution of this case. These expenses are comprised of \$5,000 in expert fees and \$2,083.33 for a subscription to Black Book to ensure payments using Black Book values under the Settlement are valued correctly.

5. When combined with the time previously submitted to the Court on September 30, 2020, my firm has spent a total of 1,562.50 hours working on this case, for a total lodestar amount of \$999,737.50. My firm has also expended \$39,443.71 in total costs.

Dated: November 6, 2020

/s/ Matthew D. Schelkopf
Matthew D. Schelkopf